

FILED  
LODGED

ENTERED  
RECEIVED

SEP 10 2008

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY \_\_\_\_\_ DEPUTY

Kevin Wilson- Pro Se  
4910 Grid Street  
Mitchellville, Md. 20721

**PJM 08 CV 2359**

(Name and address of the plaintiff)  
Plaintiff(s)

Civil No: \_\_\_\_\_

Vs.

Director of Human Resources  
Christine Knighton-Russell Savoy  
Fred Shumate  
Board of Education- Patricia Fletcher  
14201 School Lane  
Upper Marlboro, Md. 20772  
Jill Walker-Ressie Thomas  
12500 Woodmore Rd.  
Mitchellville, Maryland 20721  
(Name and address of the defendant(s))

Defendant(s)

\*\*\*\*\*

Complaint

1. Jurisdiction in this case based on:

Diversity(none of the defendants are residents of the state where the plaintiff is a resident)

✓Federal questions( suit is based upon a federal statute or provision of the Unites States Constitution)

Other(explain)

Page 2-

Kevin Wilson, for his cause of action against the defendants, states and alleges the following:

1. Plaintiff was racially discriminated against by the Prince George's County, Maryland Board of Education and their Human Resources Department in December 12, 2006.
2. Plaintiff was subjected to harassment from October 6, -to October 31, 2006 by a female student at Woodmore Elementary School . See Attachments.
3. Plaintiff was accused of insubordination on December 4, 2006 and received defamatory remarks by defendant and parent of the harasser.
4. Plaintiff was told by Russell Savoy, a human resources employee that he was terminated by the principal- defendant on December 12, 2006. Plaintiff, for attempting to resolve questionable employment practices, and for reporting illegal activities and hostile environment conditions in a school setting on to outside sources, on December 11, 2006 was retaliated against by defendant- principal.
5. Plaintiff received letter on June 23, 2008, stating that he was not terminated at all. See Attachments. Plaintiff is ready and willing to provide witnesses who shall testify in court on these issues.
6. Plaintiff filed EEOC complaint June 2007. Plaintiff received right to sue letter July 10, 2008.

As a former employee of the Defendant's agency, Maryland Employment Work and Labor Relations-West Law Section 18, Page 450 states: The general rule that an at-will employee can be discharged at anytime, with or without reason, does not apply if the decision to terminate the employment was because of the employee's exercise of the First Amendment or other

Page 3-

constitutionally protected rights- 14<sup>th</sup> Amendment and Title VII.

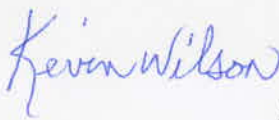
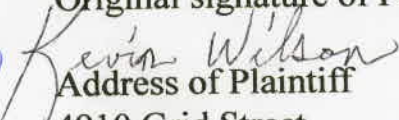
The relief I want the court to order:

It's been a rumor mill of inadequate reporting and supported documentation of my termination. Plaintiff seek redress in the court of law. To remove all allegations from Plaintiff's personnel file, a formal letter of apology to Plaintiff's residence, and employment file, to clear Plaintiff's name of any wrongdoing in writing, and to reinstate the Plaintiff in a vacancy he's qualified for.

Damages in the amount of: \$3. 4 million, including back pay with interest from December 12, 2006.

An injunction ordering:

Other(explain):

 Original signature of Plaintiff  
 Address of Plaintiff  
4910 Grid Street  
Mitchellville, Md. 20721